

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAKE THE ROAD STATES, INC.,  
NAACP BUCKS COUNTY BRANCH  
2253, BUXMONT UNITARIAN  
UNIVERSALIST FELLOWSHIP,  
and JUAN NAVIA

Plaintiffs

v.

FREDERICK A. HARRAN,  
Individually and in his official capacity  
as Sheriff of Bucks County,  
and BUCKS COUNTY,

Defendants.

NO. 2:25-CV-02938

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**DEFENDANT, BUCKS COUNTY’S MEMORANDUM IN SUPPORT OF PLAINTIFF’S  
EXPEDITED MOTION FOR REMAND TO THE BUCKS COUNTY COURT OF  
COMMON PLEAS**

Defendant Bucks County (“the County”), by and through its counsel, Daniel D. Grieser, Esquire, respectfully submits this Memorandum in Support of Plaintiff’s Motion for Remand to the Bucks County Court of Common Pleas.

The County did not and does not consent to Defendant Frederick Harran’s removal from state court under 28 U.S.C. § 1441(a). Similarly, the County did not and does not consent or ratify Defendant Harran’s execution of the 287(g) agreement. Since the County first became aware of Defendant Harran’s submission of a letter of interest to join the 287(g) program as a law enforcement partner, Defendant Harran and/or his counsel have refused to provide information to the County regarding the status of the agreement or any actions taken by Defendant Harran pursuant to it.

As detailed in the Plaintiffs' Memorandum of Law:

1. Defendant Harran's attempt to remove this action under 28 U.S.C. § 1441(a) is procedurally defective because he failed to obtain the required consent from Defendant Bucks County, as mandated 28 U.S.C. § 1446(b)(2)(A).
2. Removal under § 1441(a) is also improper because Plaintiffs' Complaint asserts purely state law claims.
3. Defendant Harran's attempt to invoke a removal under 28 U.S.C. § 1442(a)(1) in his Amended Notice is also improper, because the Complaint assert no claims against any federal officer or agent, and Defendant Harran cannot demonstrate that this action relates to any conduct he performed on behalf of the United States or under color of any federal office.

Accordingly, the County respectfully requests the Court issue an order immediately remanding this action to the Bucks County Court of Common Pleas.

Respectfully Submitted,

**BUCKS COUNTY LAW DEPARTMENT**

Dated: 6/20/2025

BY: /s/ Daniel D. Grieser  
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*County of Bucks*